Case 1:08-cv-03357-AKH Document 11 Filed 05/15/2008

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

SCANNED

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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an unincorporated labor organization, Plaintiff,

Service Employees
International Union Defendant.
Local 32B - 32J et al.

<u>08</u> cv <u>3357 (AKH</u>)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Larry Engelstein a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Robert M. Weinberg Firm Name: Bredhoff & Kaiser, P.L.L.C.

Address: 805 Fifteenth Street, NW, Suite 1000

City/State/Zip: Washington, DC 20005

Phone Number: (202) 842–2600 Fax Number: (202) 842–1888

is a member in good standing of the Bar of the States of

District of Columbia

There are no pending disciplinary proceeding against Robert M. Weinberg in any State or Federal court.

Dated: May $\frac{13}{2}$, 2008

City, State: New York, NY

Respectfully submitted,

Sponsor's

SDNY Bar 0131

Firm Name: Service Employees International Union, Local 32BJ

Address: 101 Avenue of the Americas 22nd Floor

City/State/Zip: New York, New York 10013

Phone Number: 212 - 388-2128 Fax Number: 212 - 388-3660

Form Web 10/2006

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Allied International Union,

Plaintiffs,

v.

Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, Service Employees International Union Local 1877, and Service Employees International Union,

Case No.: 08 cv 03357 (AKH)

DECLARATION OF LARRY ENGELSTEIN IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Defendants.

Larry Engelstein declares as follows:

- I am General Counsel for Service Employees International Union, Local 32BJ, 1. counsel for Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Robert M. Weinberg as counsel pro hac vice to represent Defendants Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, and Service Employees International Union Local 1877 in this matter.
- I am a member in good standing of the bar of the State of New York, and was 2. admitted to practice law on November 30th of 1999. I am also admitted to the Bar of this Court and am in good standing with this court.
- Mr. Weinberg is a member at Bredhoff & Kaiser P.L.L.C., in Washington, D.C.. 3.

- I believe Mr. Weinberg to be a skilled attorney, a person of integrity, experienced 4. in Federal practice and familiar with the Federal Rules of Procedure.
- Accordingly, I am pleased to move the admission of Robert M. Weinberg, pro hac 5. vice.
- I respectfully submit a proposed order granting the admission of Robert M. 6. Weinberg, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Robert M. Weinberg pro hac vice, to represent Service Employees International Union Local 32BJ, Michael Fishman, Andrew Friedman, Niel Diaz, Service Employees International Union Local 1877 in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct and was executed this 13 day of May, 2008, at New York. New York.

Larry Engelstein (SS 0131)

United States District Court

SOUTHERN DISTRICT OF NEW YORK

Allied International Union, an unincorporated labor Plaintiff, organization,

08 cv 3357 (AKH)

- against -

Service Employees International Union Local 32B-32J et al. Defendant.

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Larry Engelstein attorney for Defendants ,please see attached, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Robert M. Weinberg

Firm Name: Bredhoff & Kaiser, P.L.L.C.

Address: 805 Fifteenth Street, NW, Suite 1000

City/State/Zip: Washington, DC 20005

Telephone/Fax: (202) 842 - 2600

Email Address: rweinberg@bredhoff.com

is admitted to practice pro hac vice as counsel for please see attached in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: City, State:

United States District/Magistrate Judge

Attachment to Order for Admission Pro Hac Vice on Written Motion

Parties represented by Larry Engelstein and Robert M. Weinberg:

- 1) Service Employees International Union, Local 32BJ
- 2) Michael Fishman
- 3) Andrew Friedman
- 4) Niel Diaz
- 5) Service Employees International Union, Local 1877



District of Columbia Court of Appeals Committee on Admissions 500 Indiana Avenue, N.W. — Room 4200 Washington, A. C. 20001 202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

ROBERT M. WEINBERG

was on t	he	714	d	ay of	N	OVEM	IBER,	1969				
duly qu	alifi	ed a	and .	admitted	d as	an	atto	orney	and	coun	selor	anc
entitled	d to	pra	ctice	e befor	e th	iis	Cour	t and	is,	on	the	date
indicate	ed be.	low,	an a	ctive m	ember	in	good	l stand	ding	of th	nis Ba	ar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 12, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Claulis
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Admit Counsel Pro Hac Vice was served, via First Class Mail, on this 15 day of May, 2008, upon the following:

Kevin Michael Hart Stark & Stark, P.C. P.O. Box 5315 Princeton, NJ 08543 Service Employees International Union 1800 Massachusetts Avenue, NW Washington, DC 20036

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Larry Engelstein, SS 0131 Service Employees International Union, Local 32BJ 101 Avenue of the Americas, 22nd Floor New York, N.Y. 10013